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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

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CASE NO. 00-6022-CIV-LENARD

HENRY NARANJO and  
MARLENE RAMIREZ,

Magistrate Judge Turnoff

v.  
Plaintiffs,

STEPHEN BYRON SMITH, PALMER  
JOHNSON EXPORT SALES, INC.,  
PALMER JOHNSON DISTRIBUTORS,  
INC., and PALMER JOHNSON, INC.

**OBJECTION TO REQUEST FOR  
PRODUCTION TO DEFENDANT  
PALMER JOHNSON, INC.**

Defendants.

COMES NOW, the Defendant PALMER JOHNSON, INC., and pursuant to the Federal Rules of Civil Procedure, files this its Objection to Request for Production to Defendant PALMER JOHNSON, INC., and as grounds therefor would say as follows:

1. That the Defendant PALMER JOHNSON, INC. objects to Request 21, as it is unduly burdensome, vague, and in the form of a question which is outside the scope of Rule 34 of the Federal Rules of Civil Procedure, which contemplates the production of documents and not responses to questions.

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that a true and correct copy of the foregoing was furnished by mail on the 30 day of November 2000 to: Manuel Valdes, Esq., Rivkind & Pedraza, P.A., 66 W. Flagler St., Suite 600, Miami, FL 33130; F. David Famulari, Esq., Underwood, Karcher

SLP

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& Karcher, P.A., 2900 SW 28th Terrace, 6th Floor, Miami, FL 33133; and John D. Kallen, Esq., Badiak, Will & Kallen, 17071 W. Dixie Hwy., N. Miami Beach, FL 33160.

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By:   
FRANK J. SIOLI  
Fla. Bar No. 9652